

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.

00-6361

18 U.S.C. §371

18 U.S.C. §659

CR - DIMITROULEAS

UNITED STATES OF AMERICA,)

Plaintiff,)

vs.)

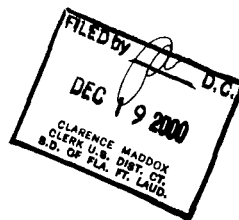
AQUILINO DIMITRI ALONSO,)

GUSTAVO RABAZA, and)

FELIX UGARTE, a/k/a "El Negro,")

Defendants.)

**MAGISTRATE JUDGE
SNOW**



SEALED INDICTMENT

COUNT I

The Grand Jury charges that:

1. From on or about November 17, 1999, through on or about November 26, 1999, in Broward and Miami-Dade Counties, in the Southern District of Florida, and elsewhere, the defendants,

AQUILINO DIMITRI ALONSO,
GUSTAVO RABAZA, and
FELIX UGARTE,
a/k/a "El Negro,"

knowingly and willfully combined, conspired, confederated and agreed with each other and with persons unknown to the Grand Jury to receive and possess goods and chattels of a value in excess of \$1,000 which had been stolen from motor trucks and storage facilities, while said goods and chattels were moving as and were part of an interstate shipment of freight, in violation of Title 18,

382

United States Code, Section 659.

OBJECT OF THE CONSPIRACY

2. It was the object of the conspiracy that the defendants would unlawfully enrich themselves by knowingly and willfully receiving and possessing goods and chattels which had been stolen from motor trucks and storage facilities and subsequently reselling them.

MANNER AND MEANS OF THE CONSPIRACY

3. It was a part of the conspiracy that the defendants AQUILINO DIMITRI ALONSO and GUSTAVO RABAZA participated in transporting stolen goods and chattels to a warehouse located in Broward County.

4. It was further a part of the conspiracy that the defendants AQUILINO DIMITRI ALONSO, GUSTAVO RABAZA, and FELIX UGARTE, a/k/a "El Negro," participated in storing stolen goods and chattels inside a warehouse located in Broward County.

OVERT ACTS

5. In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the Southern District of Florida and elsewhere:

(a) On or about November 18, 1999, the defendants AQUILINO DIMITRI ALONSO and GUSTAVO RABAZA helped direct a truck which contained a load of stolen Panasonic VCRs into a warehouse located at 2211 SW 59 Avenue, Hollywood, Florida.

(b) On or about November 19, 1999, the defendants AQUILINO DIMITRI ALONSO, GUSTAVO RABAZA, and FELIX UGARTE, a/ka "El Negro," participated in removing a load of stolen Panasonic VCRs from a container located inside a warehouse at 2211

SW 59 Avenue, Hollywood, Florida.

All in violation of Title 18, United States Code, Section 371.

COUNT III

From on or about November 17, 1999, through on or about November 26, 1999, in Broward and Miami-Dade Counties, in the Southern District of Florida, and elsewhere, the defendants,

AQUILINO DIMITRI ALONSO,
GUSTAVO RABAZA, and
FELIX UGARTE,
a/k/a "El Negro,"

did knowingly and willfully receive and possess stolen goods and chattels of a value in excess of \$1,000, that is, Panasonic VCRs, which had been stolen from a motor truck and storage facility, while said goods and chattels were a part of an interstate shipment of freight, in violation of Title 18, United States Code, Sections 659 and 2.

A TRUE BILL


FORERSON


GUY A. LEWIS
UNITED STATES ATTORNEY


DONALD F. CHASE, II
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO. _____

v.

CERTIFICATE OF TRIAL ATTORNEY*

AQUILINO DIMITRI ALONSO et al

Superseding Case Information:

Court Division: (Select One)

X Miami Key West
FTL WPB FTP

New Defendant(s) Yes No
Number of New Defendants
Total number of counts

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.

3. Interpreter: (Yes or No) Yes
List language and/or dialect Spanish

4. This case will take 5 days for the parties to try.

5. Please check appropriate category and type of offense listed below:
(Check only one) (Check only one)

I	0 to 5 days	<u>X</u>	Petty	<u> </u>
II	6 to 10 days	<u> </u>	Minor	<u> </u>
III	11 to 20 days	<u> </u>	Misdem.	<u> </u>
IV	21 to 60 days	<u> </u>	Felony	<u>x</u>
V	61 days and over	<u> </u>		

6. Has this case been previously filed in this District Court? (Yes or No) NO

If yes:

Judge: _____ Case No. _____
(Attach copy of dispositive order)

Has a complaint been filed in this matter? (Yes or No) NO

If yes:

Magistrate Case No. _____

Related Miscellaneous numbers: _____

Defendant(s) in federal custody as of _____

Defendant(s) in state custody as of _____

Rule 20 from the _____ District of _____

Is this a potential death penalty case? (Yes or No) NO

7. Does this case originate from a matter pending in the U. S. Attorney's Office prior to April 1, 1999? Yes X No If yes, was it pending in the Central Region? Yes No

8. Did this case originate in the Narcotics Section, Miami? Yes X No

Donald F. Chase II
DONALD F. CHASE, II
ASSISTANT UNITED STATES ATTORNEY
Court No. A5500077

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
PENALTY SHEET

Defendant's Name: AQUILINO DIMITRI ALONSO No.: _____

Count #1:

Conspiracy to Commit Theft of Interstate Shipment of Property

18 U.S.C. §371

*Max Penalty: 5 years' imprisonment; \$250,000 fine.

Count #: 2

Theft of Interstate Shipment of Property

18 U.S.C. 659

*Max Penalty: 10 years' imprisonment; \$250,000 fine.

Count #:

*Max Penalty:

Count #:

*Max Penalty:

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms or forfeitures that may be applicable.**

REV. 12/12/96

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
PENALTY SHEET

Defendant's Name: GUSTAVO RABAZA No.: _____

Count #1:

Conspiracy to Commit Theft of Interstate Shipment of Property

18 U.S.C. §371

*Max Penalty: 5 years' imprisonment; \$250,000 fine.

Count #: 2

Theft of Interstate Shipment of Property

18 U.S.C. 659

*Max Penalty: 10 years' imprisonment; \$250,000 fine.

Count #:

*Max Penalty:

Count #:

*Max Penalty:

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms or forfeitures that may be applicable.**

REV. 12/12/96

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
PENALTY SHEET

Defendant's Name: FELIX UGARTE No.: _____

Count #1:

Conspiracy to Commit Theft of Interstate Shipment of Property

18 U.S.C. §371

*Max Penalty: 5 years' imprisonment; \$250,000 fine.

Count #: 2

Theft of Interstate Shipment of Property

18 U.S.C. 659

*Max Penalty: 10 years' imprisonment; \$250,000 fine.

Count #:

*Max Penalty:

Count #:

*Max Penalty:

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms or forfeitures that may be applicable.**

REV. 12/12/96